#1

COMPLETE

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Page 1

Q1

Contact information

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Q2

Please comment on Defining Management Subunits for use during Epizootic Hemorrhagic Disease Outbreaks

I strongly agree with this proposal. I wish it would have been done years ago. Starting in 2005. Where we hunt in unit 690 EHD has wiped out whitetails and to some degree had effect on antelope. The effects can be very localized. Seems every time the herd rebounds, then another out break. Multiple doe tags are still issued district wide. Makes herd recovery in the localized EHD areas difficult and very slow. Thank you for addressing this issue.

Q3

Respondent skipped this question

Optional: Upload your comments

#2

COMPLETE

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Page 1

Q1

Contact information

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Q2

Please comment on Defining Management Subunits for use during Epizootic Hemorrhagic Disease Outbreaks

On behalf of the Montana Wildlife Federation (MWF), who for 90 years has worked to protect Montana's fish and wildlife, public lands, clean waters, and fair-chase hunting and fishing heritage, please accept these comments in support of the creation of new EHD management subunits.

Epizootic hemorrhagic disease is a serious concern and one that, unfortunately, we're seeing the impacts of more frequently, but apparently only in isolated areas - often river-bottom habitats with high deer densities. As the disease becomes more prevalent during warmer and wetter periods, and outbreaks don't typically end until the first hard frost of the year, a changing climate is likely to blame. While EHD primarily impacts white-tailed deer, it can spread to mule deer and pronghorn antelope as well. It's a serious and fatal disease, and the impacts - as well as the required management prescriptions - should not be taken lightly.

As we saw in the fall of '25, when EHD becomes an issue, it happens fast, and it's often not recognized until late in the summer or well into the fall. Corresponding management actions require swiftness and nimbleness that falls outside of the biennial season-setting. This is extra problematic in areas of the state where an unlimited number of whitetail doe tags are available, for example, and/or in areas where hunting units are very large. As we emphasized in October of '25, we appreciate the Department's swift responses to this last year, and are happy to see that the concerns brought up then are being addressed now with the Department offering a more narrowly focused reaction plan to address potential outbreaks in the future, if and when necessary.

As with all wildlife management, generally speaking, we appreciate and prefer the scalpel approach to address highly concentrated management issues - be that addressing problematic concentrations of elk, approaches to CWD management, addressing urban deer issues, or what we're seeing with EHD, all of these deserve solutions that can focus on the specific issue areas without having a broader, unintended impact on the resource.

Finally, we want to reiterate our gratitude to the Department and the Commission for the forward-looking action here. This is just the latest example of why upending the current deer hunting regulations may be unnecessary; this proposal and process again shows that Montana already has - and already uses - the tools and regional flexibility needed to address deer population concerns and achieve management objectives. And we appreciate that.

We ask the Commission to approve Alternative A, allowing the creation of these EHD management subunits as presented by the Department.

Thank you for the opportunity to comment.

-Kevin Farron, Conservation Director
Montana Wildlife Federation

Q3

Respondent skipped this question

Optional: Upload your comments